

## **SOUHEGAN RIVER LOCAL ADVISORY COMMITTEE**

July 29, 2019

To: Wilton NH Select Board  
Wilton NH Planning Board

In 2000, the Souhegan River was designated by the State of New Hampshire for protection under RSA 483. This designation requires that the Commissioner of the Department of Environmental Services appoint a Local Advisory Committee, which we are.

One of the several responsibilities of an LAC is “To consider and comment on any federal, state, or local government plans to approve license, fund or construct facilities that would alter the resource values and characteristics for which the river or segment is designated.”

The Shoreland Water Quality Protection Act offers an extra level of protection for significant instream river resources.

The Souhegan River Local Advisory Committee (SoRLAC) strongly opposes the proposal to exempt an area of downtown Wilton from the NH Shoreland Protection Act.

We disagree that the shoreland of the proposed district “has a shoreland so developed as to have nothing of environmental value left to protect” (RSA Chapter 483-B). The water quality of the river has environmental value left to protect.

Some parcels of the proposed exemption district have 100% impervious surfaces but a significant area of the district is 50% vegetated still (NRPC). A large portion of what DES and LACs review within the river corridor is the handling of stormwater runoff from impervious surfaces. This provides major protection for the water quality of the river and its living aquatic resources. Water quality also affects the entire corridor of the river, not just the community of Wilton.

We understand that economic development in Wilton is a top priority at this time. The Souhegan River is a focal point around which the town of Wilton is laid out. Having a clean, little polluted waterbody running through the center of town is a priceless attribute for the town.

We concur with the Wilton Conservation Commission:

- 1) The application does not include a map showing the still vegetated areas along the banks of Stony Brook and the Souhegan River. Wilton still has extensive vegetative buffers within the proposed urban exemption area and in the shoreland protection area that help preserve the water quality of these two protected rivers.

- 2) Abandoning state protections in the shoreland protection zone is not recommended. Many property owners are unaware of how their activities in the shoreland protection zone affect water quality for all. This area in Wilton is subject to redevelopment at which times improvements to water runoff quality may be made
- 3) Without the Shoreland Protection Act, our NH watersheds, rivers, coast line and lakes would not be in as good quality that they are today. The state and SorLAC can provide examples and education for creative landscaping and stormwater options that create habitats that work for people and the environment.

In our opinion, the exemption option is directly in conflict with the Designation and should be identified as an action not to be attempted with any protected river.

Yours truly,

Celeste Barr, Correspondence Secretary  
Souhegan River Local Advisory Committee

CC: NH DES  
Wilton Conservation Commission